

Exhibit 1

Kozlowski, Nicole

From: Ari Ungar <aungar@osenlaw.com>
Sent: Thursday, February 1, 2024 1:26 PM
To: Ingerman, Brett; Aaron Schlanger; Kozlowski, Nicole; Peck, Andrew; Siegfried, Jonathan; Collins, Erin; Earnest McKee, Lane; Setrakian, Berge; Civetta, Margaret; Coles, Anthony P.
Cc: Gary Osen; Michael Radine; Zahra R. Dean; James P. Bonner; Susan M. Davies (sdavies@fbrllp.com); Ed Macallister; Noel J. Nudelman; Patrick L. Rocco
Subject: RE: Miller v. Arab Bank; Pam v. Arab Bank

⚠ EXTERNAL MESSAGE

Brett,

Thank you for your January 29 letter.

We have reviewed Arab Bank's responses and have requests that will further facilitate the contemplated discussion between the parties' IT professionals.

1. For those customers/counterparties from whom you have received consent, please provide us with the search terms and SQL code that Arab Bank used to search each source of ESI in Gaza/West Bank, Lebanon, and Jordan, including Arab Bank's electronic records archiving systems, the new SQL code developed to search its Equation CORE banking system, the restored 1998–2004 “monthly backup cartridges” for the Equation system, and Arab Bank's Enterprise Content Management (“ECM”) System.
2. Please provide us with the search terms that Arab Bank used to search each source of paper records in Gaza/West Bank, Lebanon, and Jordan.
3. Please provide us with any written materials documenting Arab Bank's 90-day retention period policy for electronic storage of SWIFT messages.
4. Your letter also states that, during the Relevant Period, Arab Bank Jordan sent all U.S. dollar-denominated checks to Arab Bank New York for processing through FRB-New York. Please send us confirmation that Arab Bank New York's records have been searched for checks responsive to the Court's production order and provide the search terms and SQL code used to search for those records.

In addition, we appreciate your clarification concerning how the Palestinian Monetary Authority's manual funds transfer clearing system worked for incoming and outgoing payments in different currencies. It would be helpful to the parties' anticipated discussion if you could describe what ESI or paper records exists for funds transfers processed through this system.

Your letter also states that Arab Bank has all Equation CORE banking system data from 1998–2004, all SWIFT messages in electronic format from April to December 2004, and all SWIFT messages in paper format from 1998–2004. Please correct us if we are mistaken, but we don't believe Plaintiffs have yet

received any ESI from the Equation CORE banking system or any SWIFT messages in paper format from 1998–2004.

Finally, your letter states that “Arab Bank Jordan and Arab Bank Lebanon stopped using the Telex machines in 1999.” However, Excel spreadsheets produced by Arab Bank in *Linde* (e.g., ABPLC198090, ABPLC198132, ABPLC198668, ABPLC199218, ABPLC199658, ABPLC200098, and ABPLC209715) appear to indicate that Arab Bank Jordan sent and received thousands of Telex messages to and from its counterparty Palestinian banks—including Arab Bank Palestine—between 2000 and 2004. Please ask your IT team to review the referenced spreadsheets and confirm whether they reflect the use of Telex machines by Arab Bank Jordan after 1999 and if so, whether Arab Bank has additional Telex-related ESI to search.

Thank you in advance for the courtesy of your reply. Once we have received the additional information and clarifications, we can schedule a hopefully productive call between the IT professionals.

Regards,

Ari Ungar
Attorney at Law

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From: Ingerman, Brett <brett.ingerman@us.dlapiper.com>
Sent: Monday, January 29, 2024 2:19 PM
To: Aaron Schlanger <aschlanger@osenlaw.com>; Kozlowski, Nicole <nicole.kozlowski@us.dlapiper.com>; Peck, Andrew <andrew.peck@us.dlapiper.com>; Siegfried, Jonathan <Jonathan.Siegfried@us.dlapiper.com>; Collins, Erin <Erin.Collins@us.dlapiper.com>; Earnest McKee, Lane <lane.mckee@us.dlapiper.com>; Setrakian, Berge <Berge.Setrakian@us.dlapiper.com>; Civetta, Margaret <Margaret.Civetta@us.dlapiper.com>; Coles, Anthony P. <anthony.coles@us.dlapiper.com>
Cc: Gary Osen <gosen@osenlaw.com>; Ari Ungar <aungar@osenlaw.com>; Michael Radine <mradine@osenlaw.com>; Zahra R. Dean <zdean@kohnswift.com>; James P. Bonner <JBonner@fbrlp.com>; Susan M. Davies <sdavies@fbrlp.com>; <sdavies@fbrlp.com>; Ed Macallister <emacallister@perleslaw.com>; Noel J. Nudelman <njnuedelman@hnklaw.com>; Patrick L. Rocco <Procco@fbrlp.com>
Subject: RE: Miller v. Arab Bank; Pam v. Arab Bank

CAUTION: This email originated from outside of the organization.

Counsel-

Please see the attached response to your letter.

Brett

From: Aaron Schlanger <aschlanger@osenlaw.com>

Sent: Friday, December 15, 2023 10:48 AM

To: Ingerman, Brett <brett.ingerman@us.dlapiper.com>; Kozlowski, Nicole <nicole.kozlowski@us.dlapiper.com>; Peck, Andrew <andrew.peck@us.dlapiper.com>; Siegfried, Jonathan <Jonathan.Siegfried@us.dlapiper.com>; Collins, Erin <Erin.Collins@us.dlapiper.com>; Earnest McKee, Lane <lane.mckee@us.dlapiper.com>; Setrakian, Berge <Berge.Setrakian@us.dlapiper.com>; Civetta, Margaret <Margaret.Civetta@us.dlapiper.com>; Coles, Anthony P. <anthony.coles@us.dlapiper.com>

Cc: Gary Osen <gosen@osenlaw.com>; Ari Ungar <aungar@osenlaw.com>; Michael Radine <mradine@osenlaw.com>; Zahra R. Dean <zdean@kohnswift.com>; James P. Bonner <JBonner@fbrllp.com>; Susan M. Davies (sdavies@fbrllp.com) <sdavies@fbrllp.com>; Ed Macallister <emacallister@perleslaw.com>; Noel J. Nudelman <njnudelman@hnklaw.com>; Patrick L. Rocco <Procco@fbrllp.com>

Subject: Miller v. Arab Bank; Pam v. Arab Bank

⚠ EXTERNAL MESSAGE

Counsel,

Please see the attached letter.

Aaron Schlanger
Attorney at Law

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